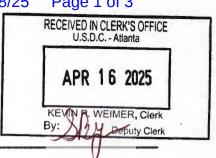
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IN THE UNITED STATES DISTRICTORY	A-Manta	Durina
FOR THE Northern Distript GEORGIA	tt langa	TIN PIOL)



Tasha Helm,

Plaintiff.

V.

Fiserv, Inc.,

Defendant.

Civil Action No.:

1:25-CV-2108

#### COMPLAINT FOR EMPLOYMENT DISCRIMINATION

(Filed pursuant to Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e et seq.) JURY TRIAL DEMANDED

#### I. JURISDICTION AND VENUE

- 1. Jurisdiction is conferred upon this Court pursuant to 28 U.S.C. §§ 1331 and 1343, and 42 U.S.C. § 2000e-5(f)(3).
- 2. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) as the acts and omissions giving rise to the claims occurred within this District.

# **II. PARTIES**

- 3. Plaintiff, Tasha Helm, is a resident of Cobb County, Georgia, and was employed by Defendant within this District until her termination on or about February 1, 2024.
- 4. **Defendant**, Fiserv, Inc., is a corporation duly organized under the laws of Wisconsin with operations in the Northern District of Georgia and is an employer within the meaning of Title VII.

# **III. PROCEDURAL REQUIREMENTS**

- 5. Plaintiff timely filed a charge of discrimination (EEOC Charge No. 410-2024-10764) with the Equal Employment Opportunity Commission ("EEOC") on or about July 2024. Wherein the Defendant was notified as a courtesy.
- 6. Plaintiff received a Notice of Right to Sue from the EEOC on [IJanuary 16, 2025 Receipt], and this action is filed within 90 days of receiving that notice.

#### IV. FACTUAL ALLEGATIONS

- 7. Plaintiff was employed by Defendant from January 2011 through February 2024, most recently serving as Director within the Corporate Social Responsibility department.
- 8. Plaintiff received multiple awards, accolades, and was repeatedly recognized for her high performance, innovation, and leadership across her tenure.
- Beginning in 2022, Plaintiff experienced a pattern of discriminatory treatment including microaggressions, unfair treatment, hostile and toxic environment, exclusion from meetings related to her duties, and retaliation after raising internal concerns.
- 10. Despite positive recognition by MC-level leadership, Plaintiff's responsibilities were reassigned to less experienced employees.
- 11. In February 2024, Plaintiff was terminated under the pretext of a reduction-in-force, despite her programmatic work continuing and being reassigned internally.
- 12. Fiserv's counsel communicated in July, 2024 that severance compensation line items were available without any specified end date or attached conditions. No expiration was mentioned.
- 13. Subsequently, Defendant reversed this position without providing documentation, asserting the availability had expired for the full amount offered and proposing a reduction based on their incurred legal fees.
- 14. Plaintiff retained two attorneys without the benefit of contingency arrangements and has incurred substantial out-of-pocket legal costs.
- 15. Plaintiff sought internal resolution in good faith for over 14 months, without remedy.

## V. CAUSES OF ACTION

## COUNT I: Discrimination Based on Race and Gender (Title VII)

- 16. Plaintiff re-alleges and incorporates the foregoing paragraphs.
- 17. Defendant discriminated against Plaintiff, subjecting her to disparate treatment, exclusion, and ultimate termination.

## **COUNT II: Retaliation (Title VII)**

18. Plaintiff engaged in protected activities that were carved out for Inclusion and was subjected to retaliatory actions, including removal from programs and eventual termination.

#### **COUNT III: Hostile Work Environment**

19. Defendant created and permitted a hostile work environment, wherein Plaintiff was subjected to ongoing microaggressions, public ridicule, and undue scrutiny, creating conditions that were uncomfortable.

## **VI. DAMAGES**

- 20. As a direct and proximate result of Defendant's actions, Plaintiff has suffered:
- Loss of wages and benefits
- **Emotional distress and mental anguish**
- Legal expenses and professional damage
- 21. Plaintiff seeks all available remedies under Title VII, including:
- Back pay and front pay
- Compensatory and non-economic damages
- **Punitive damages**
- Attorney's fees and costs
- Any other relief this Court deems just and proper

## **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court:

a. Enter judgment in her favor; b. Award damages as permitted under law; c. Grant a trial by jury, d. Award attorney's fees and costs; and e. Provide such other and further relief as justice may require.

JURY DEMAND OF Mediation

Plaintiff demands a trial by jury on all claims so triable.

Respectfully submitted,

Tasha Helm

770-851-4851 trhw07@gmail.com

Pro Se Plaintiff